

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TERRENCE ZEIGLER

17CV4944

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

NEW YORK CITY POLICE COMMISSIONER,
WILLIAM BRATTON; 75TH PRECINCT DETECTIVES
CAUCASIAN, AND LATINO JOHN DOES #1, 2, 3, & 4.
5:6

COMPLAINT

under the
Civil Rights Act, 42 U.S.C. § 1983
(Prisoner Complaint)Jury Trial: ☒ Yes ☐ No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

Parties in this complaint

List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name TERRENCE ZEIGLER

ID #

Current Institution ERIC M. TAYLOR CENTER (E.M.T.C.)Address 10-10 HAZEN STREETEAST ELMHURST, N.Y. 11370

B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name WILLIAM BRATTON

Shield #

Where Currently Employed NEW YORK CITY POLICE COMMISSIONERAddress ONE POLICE PLAZANEW YORK, N.Y. 10007

Defendant No. 2 Name JOHN DOE #1 CAUCASIAN Shield #
 Where Currently Employed 75TH PCT.
 Address 1000 SUTTER AVE
BROOKLYN, N.Y. 11208

Defendant No. 3 Name JOHN DOE, #2 CAUCASIAN Shield #
 Where Currently Employed 75TH PCT.
 Address 1000 SUTTER AVE
BKLYN, N.Y. 11208

Defendant No. 4 Name JOHN DOE #3 LATINO Shield #
 Where Currently Employed 1000 SUTTER AVE 75TH PCT.
 Address 100 SUTTER AVE
BKLYN, N.Y. 11208

Defendant No. 5 Name JOHN DOE #4 LATINO Shield #
 Where Currently Employed 75TH PCT.
 Address 1000 SUTTER AVE
BKLYN, N.Y. 11208

II. Statement of Claim:

State as fully as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in the action, along with the date and locations of all relevant events you may wish to include in the details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur?
NOT APPLICABLE

B. Where in the institution did the events giving rise to your claim(s) occur?
NOT APPLICABLE

C. What date and approximate time did the events giving rise to your claim(s) occur?
BETWEEN AUGUST 5, & 12, 2016 AT APPROXIMATELY 10:45 P.M.

DEFENDANT NO. 6. JOHN DOE #5 LATINO
75TH PCT.
1000 SUTTER AVENUE
BROOKLYN, N.Y. 12208

DEFENDANT NO. 7. JOHN DOE #6 CAUCASIAN
75TH PRECINCT
1000 SUTTER AVENUE
BROOKLYN, N.Y. 12208

D. Facts: BETWEEN AUGUST 5, & 12, 2016 AT APPROXIMATELY 10:45 P.M. WHILE PLAINTIFF TERENCE ZEIGLER, AND WIFE SHATURRA, AND TWO(2) YEAR OLD SON WERE HAVING AND SPENDING A LOVELY EVENING TOGETHER AS A FAMILY THE DEFENANTS ALL SIX JOHN DOES INTERRUPTED PLAINTIFF'S PEACEFUL ATMOSPHERE BY UNLAWFULLY BANGING AND EVENTUALLY BREAKING DOWN PLAINTIFF'S DOOR (BASEMENT) TO ARREST ANOTHER INDIVIDUAL THAT LIVED THREE(3) FLIGHTS UPSTAIRS. THEY RANSACKED PLAINTIFF'S APARTMENT TERRORIZED AND SCARED PLAINTIFF'S TWO(2) YEAR OLD SON, AND WIFE WITHOUT ANY LAWFUL AUTHORITY AND/OR WARRANT, AND THEN UNLAWFULLY ARRESTED PLAINTIFF FOR AN OLD FINE WHICH IS A VIOLATION AND NOT A CRIME FOR THE MERE ACT OF DRIVING WITHOUT A LICENSE, BUT ONLY HAD AN ARREST WARRANT FOR AN UNKNOWN MALE THAT RESIDED UP STAIRS OF THE HOUSE CONNECTED TO PLAINTIFF'S BASEMENT APARTMENT. THE ENTRY TO PLAINTIFF'S DWELLING CASUALLY SUCCEEDS TO THE VIOLATION OF PLAINTIFF'S FOURTH, EIGHTH, AND FOURTEENTH MENDMENT RIGHTS WHEREAS THE SEARCH WAS RENDERED ILLEGAL SEARCH AND SEIZURE WITHOUT THE ACCOMPANYING SEARCH WARRANT, DELIBERATE INDIFFERENCE DUE TO THE FACT THAT THE SIX(6) 75TH PRECINCT DEFENDNIS HAD PRIOR KNOWLEDGE THAT THE PLINTIFF WAS NOT IN FACT THE ALLEGED REARSON ON THE RREST WARRANT THERE WAS ALSO A PROCESS THAT WAS DUE TO THE PLAINTIFF THAT HAS TO BE LAWFUL CONSISTENT WITH THE FOURTEENTH AMENDMENT. IT WAS CARRIED OUT IN A SDAISTIC AND MALIC-

III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. PLAINTIFF AND HIS FAMILY HAS AND STILL ARE SUFFERING FROM IRREPARABLY PSYCHOLOGICAL DAMAGE, INSOMNIA, FEAR AND PHOBIA FROM LAW ENFORCEMENT AGENCIES, NIGHTMARES, MIGRAINE HEADACHES, ANXIETY, LONG TERM DEPRESSION, HUMILIATION, LOSS OF LIBERTY, COMMUNITY SHAME, DIFFICULTY IN STRENGTHENING FAMILY TIES DUE TO PLAINTIFF'S INCARCERATION.

IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "no action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes ☐ No ☒

PAGE TWO(2) FACTS CONTINUED

IOUS MANNER WHEN WE CONSIDER THAT THERE IS A TWO(2) YEAR OLD CHILD PRESENT DURING AND TO WITNESS THIS VERRIFYING SCENE WATCHING HIS FATHER BEING UNLAWFULLY AND ILLEGALLY ARRESTED RIGHT BEFORE HIS TENDER EYES. THERE IS A LINE THAT HAS TO BE DRAWN BY THE DEFENDANT NEW YORK CITY POLICE COMMISSIONER WILLIAM BRATTON WHEN HIS OFFICE IS CONFRONTED WITH UNLAWFUL ARRESTS THAT UPSETS ONES CONSTITUTIONAL RIGHTS. THE TRAINING OF HIS SUBORDINATES AS A SUPERVISORY OFFICIAL IS QUESTIONABLE WHERE TOGETHER IN CONCERT WITH ONE ANOTHER CIVILLY THEY ALL ACT UNDER THE COLOR OF STATE LAW DESIGNING A PICTURE FOR THE JUSTICE TO SCRUTINIZE AND SEE AS CRUEL AND UNUSUAL PUNISHMENT THAT BRINGS ABSENCE TO PLAINTIFF'S LIBERTY INTEREST THAT AFFECTS AND EXTENDS TO HIS FAMILY MEMBERS S WELL. THE CLAUSE IN THE FOURTEENTH AMENDMENT DOES NOT END AND/OR CEASE TO EXIST WHEN PLAINTIFF IS IN FACT IN HIS OWN HOME, BUT THAT EQUAL PROTECTION CLAUSE IS MORESO IN EXISTENCE. IT BECOMES AN DEPRAVED INDIFFERENCE WHEN A TWO(2) year old child becomes a witness TO A HORRIFIC SCENE THAT WITHOUT A DOUBT WILL HAVE LONG TERM PSYCHOLOGICAL AFFECTS ON HIM AS WELL AS HIS WIFE. THERE IS NO MONETARY VALUE TO COMPETE WITH ONES SANITY. WHEREFORE, IN LIGHT OF THE FOREGOING PLAINTIFF AND HIS FAMILY PRAYS, AND ASKS THIS COURT OF OUR UNITED STATES TO DELIVER SWIFT JUSTICE IN THE INTEREST OF JUSTICE AND DELIVER JUSTICE IT DEEMS JUST AND PROPER, AND WHETEVEER OTHER RELIEF PLAINTIFF IS AND HIS FAMILY IS IN COMPENSATION FOR TO AVOID A MISCARRIAGE OF JUSTICE AND CEASE THESE UNLAWFUL ENTRIES TO AN INNOCENT PERSONS DWELLING.

DATED: JUNE 10, 2017

RESPECTFULLY SUBMITTED,
Terrence Zeigler
TERRENCE ZEIGLER, PLAINTIFF
PRO SE.

IN CONCLUSION OF THE ALLEGED FACTS IN THIS COMPLAINT, THE LOCATION OF THE ALLEGATIONS OCCURRED AT 705 LOGAN STREET, BASEMENT APARTMENT, BROOKLYN, NEW YORK 11208 WHERE THE DEFENDANTS NAMED HEREIN FROM THE 75TH PRECINCT DID HAVE A WARRANT AND/OR AUTHORITY TO ENTER LEGALLY. WHEREFORE PLAINTIFF IS ENTITLED TO REPARATION FOR THE RESTORATION OF FUNDS TO HIS DESTROYED AND DAMAGED PROPERTY BY THESE DEFENDANTS.

DATED: JUNE 12, 2017

RESPECTFULLY SUBMITTED

Terrence Zeigler
TERRENCE ZEIGLER, PLAINTIFF,
PRO SE

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s). **NOT APPLICABLE**

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes _____ No **XX** Do Not Know _____

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes _____ No **XX** Do Not Know _____

NOT APPLICABLE

IF YES, which claim(s)?

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes _____ No **XX**

IF NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes _____ No **XX**

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance? **NOT APPLICABLE**

Which claim(s) in this complaint did you grieve? **N/A**

What was the result, if any?

NOT APPLICABLE

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process.

NOT APPLICABLE

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

IT IS NOT APPLICABLE TO MY SITUATION.

2. If you did not file a grievance but informed any officials of your claim, state who you informed,

when and how, and their response, if any:

NOT APPLICABLE

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies:

NOT A GRIEVABLE INCIDENT AND/OR SITUATION

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. Relief:

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). PLAINTIFF SEEKS PAIN AND SUFFERING DAMAGES FROM EACH DEFENDANT IN THEIR INDIVIDUAL AND JOINT CAPACITY IN THE AMOUNT OF \$200,000.00 PLAINTIFF ALSO SEEKS EMOTIONAL STRESS AND MENTAL ANGUISH DAMAGES FROM EACH DEFENDANT IN THEIR INDIVIDUAL AND JOINT CAPACITY IN THE AMOUNT OF \$200,000.00 AND FINALLY PLAINTIFF SEEKS PUNITIVE DAMAGES IN THE SAME CAPACITY IN THE AMOUNT OF \$500,000.00 FOR A SUBTOTAL IN DAMAGES OF EIGHT POINT EIGHT MILLION DOLLARS. PLAINTIFF FINALLY SEEKS AN INJUNCTIVE RELIEF AGAINST THE DEFENDANTS JOHN DOE GARCASIAN AND LATINO DEFENDANTS AND ASKING THE COURT TO ORDER THE DEFENDANTS TO REFRAIN FROM MAKING UNWARRANTED ARRESTS ESPECIALLY IN FRONT OF WOMEN AND CHILDREN THAT OPERATE OUTSIDE OF THE UNITED STATES CONSTITUTION.

VI. Previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes _____ No _____

On
these
claims

If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff: NOT APPLICABLE

Defendants: N/A

2. Court (if federal court, name the district; if state court, name the county): N/A

3. Docket or Index number: N/A

4. Name of Judge assigned to your case: N/A

5. Approximate date of filing lawsuit: N/A

6. Is the case still pending? Yes ☐ No ☒ N/A

If NO, give the approximate date of disposition: N/A

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) NOT APPLICABLE

C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment? Yes ☐ No ☒

D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff: NOT APPLICABLE

Defendants: N/A

2. Court (if federal court, name the district; if state court, name the county): N/A

3. Docket or Index number: N/A

4. Name of Judge assigned to your case: N/A

5. Approximate date of filing lawsuit: N/A

6. Is the case still pending? Yes ☐ No ☒

If NO, give the approximate date of disposition: N/A

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) NOT APPLICABLE

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 10TH day of JUNE, 2017.

Signature of Plaintiff

Inmate Number

Institution Address

Terrence Zeigler
14116-11482
ERIC M. TAYLOR CENTER (E.M.T.C.)
10-10 HAZEN STREET
EAST ELMHURST, N.Y. 11370

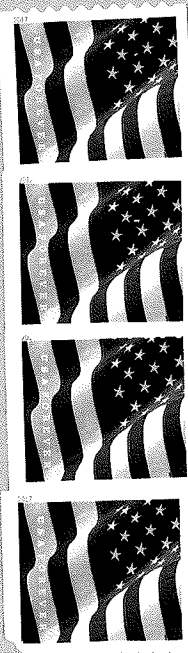
Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 10TH day of JUNE, 2017, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff

Terrence Zeigler
TERRENCE ZEIGLER, PLAINTIFF, PRO SE

MR. TERENCE ZEIGLER # 1411611482
1) 10-10 HAZEN ST, E.M.T.C.
EAST ELMHURST, N.Y. 11370



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PRO SE INTAKE UNIT, ROOM 200
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
U.S. COURTHOUSE-500 PEARL ST.
NEW YORK, N.Y. 10007

U.S.M.
SDNY
JUN 29 2017

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